

IN THE UNITED STATES  
DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS

Kevin Riley,  
Kenneth Smith

Plaintiff,

v.

Keith Nygren,  
Daniel J. Sedlock Jr.

RECEIVED

AUG 12 2008

MICHAEL W. DOBBINS  
CLERK, U. S. DISTRICT COURT

COMPLAINT  
Civil Action No. \_\_\_\_\_

08 C 501 69

Reinhard

I. JURISDICTION & VENUE

1. This is a civil action authorized by 42 U.S.C. section 1983 to redress the deprivation, under color of state law, of rights secured by the constitution of the United States. The court has jurisdiction under 28 U.S.C. section 1331 and 1343 (a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2. The Northern District of Illinois is an appropriate venue under 28 U.S.C. section 1391 (b)(2) because it is where the events giving rise to this claim occurred.

II PLAINTIFFS

3. Plaintiff Kevin M. Riley, Kenneth E. Smith, is and was at all

times mentioned herein a pretrial detainee of the State of Illinois in custody of McHenry County Correctional Center. He is currently confined in McHenry County Jail, in Woodstock, Illinois.

### III. DEFENDANTS

4. Defendant Keith Nygren is the Sheriff of McHenry County Jail in Woodstock, Illinois. He is legally responsible for the overall operation of the facility and each officer under its jurisdiction.
5. Defendant Daniel J. Sedlock Jr. is the Chief of Corrections of McHenry County Jail he is legally responsible for the operation of McHenry County Jail and the welfare of all the inmates / pretrial detainees of the facility.
6. Each defendant is sued in his official capacity. At all times mentioned in this complaint each defendant acted under the color of the State law.

### IV FACTS

7. Pre-trial detainees are required to purchase the religious book the Quran while christian books such as the bible are passed out free of charge, also there are no regular Muslim services offered while there are several christian based groups including bible study during the week, celebrate recovery on Saturday, and regular church on Sunday. This is an infringement of the first amendment rights, under the establishment clause the government can't encourage people to be religious, or chose one religion over another.

8. Our cells are routinely searched without detainees being present the court stated that "at least until or unless [Petitioner] can show a pattern of violence or other disruptions taxing the powers of control -- a kind of showing not remotely approached by the wardens expressions -- the security argument for banishing inmates while their rooms are searched must be rejected" 439 F. Supp., at 149 the court of appeals agreed with the district court. It saw "no reason whatsoever not to permit a detainee to observe the search of his room and belongings from a reasonable distance although the court permitted the removal of any detainee who became obstructive" 573 F.2d, at 132 see *Jones v. North Carolina Prisoners' Labor Union*. Though anytime a "shakedown" is performed we are removed from the area till the searches are completed violating the Fourth Amendment of the detainees. (See 20 administrative code 701.70 A-c)

9. Also I bring to the courts attention the improper classification of inmates, misdemeanor and felony offenders are housed together, there is no distinction as to short-term long-term detainees, past record, type of offense committed, violent non-violent background, age or any other factor. Coupled with the fact McHenry County Jail housed state and federal detainees together on the same sections, this is a blatant disregard for the safety & security of all detainees housed here.

10. Next issue is the inadequate and arbitrary Grievance & disciplinary hearing process. When a grievance is written there is no specific form, no copy is given to the detainee as proof, no carbon copy forms. There is no outside entity, counselor who is an impartial participant even when the grievance continues up the chain of command, no outside representative is ever present. The grievances are routinely returned Unfounded even when based in provable facts. When the grievances are sent up the chain of command no investigation

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is undertaken and one just returned unbound. I like to add grievances do not go all the way up the chain of Command nor does it get to the Sheriff as is our right as detainees, and if it is sent directly there it is thrown out for not following the proper chain of Command. In regards to the disciplinary & hearing process a minor violation you can not appeal nor can you grievance if you are found guilty with no witnesses, explanation or hearing. Major violations are heard by two Correctional officers who are co-workers with the correctional officer who wrote the disciplinary write up to begin with. Again there is no outside employee, counselor ect who is an impartial participant in the hearing process. The Chief of Corrections must sign off on the verdict & the punishment yet he's the only person you can appeal that verdict to and his decision is final. The entire process is inherently bias towards the detainee and there are no checks and balances in place to prevent corruption or ensure a fair and impartial hearing detainees are **guaranteed**. (see exhibits A-E)

11. Next are the unsafe and unsanitary living conditions of McHenry County Jail we as detainees are entitled to sanitary toilet facilities DeSpain v Uphoff 264 F. 3d 965 (10<sup>th</sup> Cir. 2001). The toilets all back up into each other in the facility housing the detainees when ever they are flushed so fecal matter and other waste byproducts are re-deposited in the toilets causing foul & repugnant odors and turning the toilet water into stagnant water, which is the breeding ground for all type of bacteria, airborne and otherwise there are also a large number of insect which come up through the drains, including but not limited to sewer flies which can spread the bacteria. Generally it combines to create a dangerous, unsafe, and unpleasant living environment for the detainee. Under the court of Appeals "compelling necessity" standard "deprivation of the rights of detainees cannot be justified by the cries of fiscal necessity ... administrative convenience ... or by the cold comfort that conditions in other jails are worse." 573 F. 2d at 124 (see exhibits -

12. This facility is not designed for long term pretrial detainees, there are no chairs the only seats are stools that are 12 inches in diameter also the stools have no backs, therefore no lumbar or back support causing detainees to hunch over leading to future back problems. The shoes detainees are provided and required to wear have no arch support causing constant pain & discomfort, also the shoes have no inside cushion. There are a large group of pretrial detainees who are long term detainees and have been detained a year or longer and are still awaiting trial but the living conditions are not designed or equipped for them. The beds have no springs it is a slab of steel and the mattress is grossly inadequate. All the recreational & living supplies are designed to tailor to short term detainees, therefore long term detainees suffer in the process. (refer to exhibits - )

13. Next, I would like to address a violation of both the due process clause and pretrial detainees first Amendment right, since 1974 courts have repeatedly held that due process forbids denying detainees the right "to shake hands with a friend, to kiss a wife, or to fondle a child." Rhem v. Malcolm (Rhem I) 371 F. Supp 594 626 (S.D.N.Y.), Aff'd 507 F. 2d 333 (2d Cir 1974), Accord Wolfish v. Levi, 573 F. 2d 11B, 126 n. 16 (2d Cir) (recognizing first Amendment right), Rhem v. Malcolm (Rhem II) 527 F. 2d 1041, 1043 (2d Cir 1975), The court at 573 F. 2d 11B affirmed Wolfish v. Levi in part and reversed it in part but held specifically that pretrial detainees have a first Amendment right to contact visits, See id at 126 n. 16. Yet pretrial detainees are denied this fundamental right. The visits are conducted through computer monitors and video camera, the court went on to say in sum it is too late in the day to suggest that it does not offend the Constitution not to permit pretrial detainees contact visits.

14. Lastly, I would like to address a violation of Illinois administrative code 701.250 regarding commissary. 701.250 section



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(c) clearly state, prices charged for those for the same articles sold in local community stores, nor shall the postal supplies exceed those for the same articles sold at the local post office. Included here in is a copy of McHenry County Commissary price list as proof of the over charging of detainees on almost not all the items (see exhibit F)

## V. EXHAUSTION OF LEGAL REMEDIES

12. Plaintiff Kevin Riley, Kenneth Smith used the grievance procedure available at McHenry County Jail to try and solve the problem, on several dates including but not limited to 2-10-08, 2-11-08, 6-19-08. On 2-11-08, 2-12-08 and 7-2-08 I received responses the 2-11-08, & 2-12-08 grievances were returned "founded". The 7-2-08 Grievance pertaining to Contact Visits was returned stating Contact Visits require court orders, and I have enclosed all responses I have I appealed the denial of these grievances.

## VI. LEGAL CLAIMS

16. Plaintiffs reallege and incorporate by reference paragraphs 1-15

17. The preferential treatment of the Christian Religion over Muslim religion, the unsafe & unsanitary living conditions, the searching of pretrial detainees cells without detainees cells, inadequate & arbitrary, Grievance, disciplinary procedure, denial of contact visitation, the improper classification of detainees state & federal, and finally the lack of proper conditions to house long term pretrial detainees violated Plaintiff Kevin Riley & Kenneth Smith's rights and constituted a due process violation under the first, fourth, and the

18. The plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which plaintiff seeks.

## VII. PRAYER FOR RELIEF

WHEREFORE, plaintiff prays that this court enter judgement granting plaintiffs:

19. A declaration that the acts and omissions described herein violated plaintiff's rights under the Constitution of the United States.

20. A preliminary and permanent injunction ordering defendants Keith Nygen and Daniel J. Sedlock Jr. to cease video visitation and reinstate contact visitation to pretrial detainees, Create and institute proper classification process, fix the unsafe and unsanitary living conditions, provide long term pretrial detainees with an environment to suit there extended time in custody (ie. proper foot ware, chairs, beds ect.) Provide all religious books & services, and provide detainees with a fair and impartial Grievance & disciplinary procedure.

21. A jury trial on all issues triable by jury

22. Plaintiff costs in this suit.

23. Any additional relief this court deems just proper, and equitable.

Dated


Respectfully Submitted


VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to those matters alleged on information and belief, and, as to those I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Executed at Woodstock, Illinois on

  
Kevin Riley

  
Kenneth Smith







**EXHIBIT A**

*Continued on back*  
**McHenry County Adult Correctional Facility**  
**INMATE REQUEST**

1530

NAME: Kevin Riley Booking I.D. #: 34982  
 DATE: 2/10/08 CELL #: 2/111

PLACE AND X NEXT TO THE ITEM YOU ARE REQUESTING AND GIVE A BRIEF EXPLANATION BELOW, ONE REQUEST PER SHEET.

REQUEST	_____	MEDICAL ATTENTION
	_____	CHAPLAIN ASSISTANCE
	_____	REQUEST TO SEE PUBLIC DEFENDER
	_____	MENTAL HEALTH COUNSELOR
	<u>X</u> _____	OTHER REQUEST WITH LT.

REMARKS: On 10-21-07 I was extracted from my cell this cell extraction was  
tape recorded as required by Illinois State law after speaking with my attorney  
he informed me all cell extractions are required to be recorded for  
both the inmates protection and officers protection, this was not done  
during this cell extraction while I was in handcuffs I was beaten in the head and  
face area my medical files show or should show 2 lumps one on or about my temple

OFFICER RECEIVING REPORT: Seeps ID # 1561 TIME 1145  
 ACTION TAKEN: Ref to log

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_  
 OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_  
 OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

on the jaw bone 40's present untill I was handcuffed then beat  
 a straight up across time in my face. Sgt Males was present for  
 his incident and the sure a report was filed I have been subject to  
 ongoing harassment from Sgt Males and the other like conduct. I  
 was just recently informed that I, Sgt. and Micherry County Jail  
 required to record all cell extraction per Illinois State law for  
 inmate & officer protection I would like to know why this was not  
 done I would like a copy of my medical file and copies made  
available for my attorney plus a copy of the Incident Report for  
 0-21-07 for a possible civil court proceeding I believe that along with  
 other incidents, these my property removed from my cell and destroyed  
 on two separate occasions, the continual harassment of Minor and Major  
 violation Illinois in 5 min plus 2 inapors in the same 24 hours period,  
 hows and documents the continual and intentional persecution of  
 me by several 40 plus the on duty Sgt's I was informed prior to  
 these tickets by Sgt Males that I will be going to SEC for my  
 supposed involvement of a theft on block 2 section 2 yet I  
 didnt receive any ticket for that but I did receive several  
 tickets subsequent to the Sgt statement. I believe in being  
 unfairly persecuted by Sgt Males in particular and several 40  
 going to ~~the~~ harass me by direct or ~~indirect~~ under the instigation  
 of Sgt Males. I feel all of this should be taken into consideration.

Inmate rights (as just name) to are being violated by not following  
 the Illinois State guidelines regarding cell extraction, and the general  
 treatment of inmates I wrote a grievance pertaining to the cell situation  
 incident prior to this yet never heard any response. I have tried  
 to talk to all 40 present but again was met with no solutions. I  
 would please request a formal response all prior attempts to resolve  
 this have been unsuccessful. I would like a copy placed in  
 my file. Thank you

EXHIBIT BContinued on back

McHenry County Adult Correctional Facility

INMATE REQUESTNAME: Kevin Riley Booking I.D. #: 34982

DATE: \_\_\_\_\_ CELL #: \_\_\_\_\_

PLACE AND X NEXT TO THE ITEM YOU ARE REQUESTING AND GIVE A BRIEF EXPLANATION BELOW, ONE REQUEST PER SHEET.

REQUEST \_\_\_\_\_

MEDICAL ATTENTION

CHAPLAIN ASSISTANCE

REQUEST TO SEE PUBLIC DEFENDER

MENTAL HEALTH COUNSELOR

XOTHER REQUEST ATTN C/O KNOX

REMARKS:

I wrote you a request over the weekend pertaining to the continuing and escalating harassment and unfair persecution of me at the hands of several I/O and certain SGT this problem is continuing I have just received two more Major violations all pertaining to an alleged theft I received no ticket or violation for this theft yet it was brought up in both tickets just to bias the board both times

OFFICER RECEIVING REPORT: MurrayID # 1352 TIME 10:00

ACTION TAKEN: \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

the trivial ones. Only a few of the envelopes in my property were returned and most were from commissary. There are no set limits listed in the inmate rule book as to the guidelines of excessive if they are going to hold inmates to a standard and use that as a basis for confiscating and destroying my personal property I should be informed what is that guideline and what's over the line. The second inmate ticket pertains to disrupting the orderly operation of this facility due to having excessive inmate envelopes. I don't see how my possession of commissary envelopes can be a disruption of the orderly operation of this facility. This I believe just goes to demonstrate the continuing and ongoing harassment, abuse, and flagrant misuse of the inmate grievance system. I would please request to speak with you regarding this issue. I believe all these "Major" and "Minor" violations go to show the length - one of the 4 and 501 will go just to set me up. I believe I'm being intentionally mistreated and the tickets are just flagrant violations of my rights and the truth to get me in Sec. for my part in an alleged theft though none of my tickets are for this "theft". It states on both the tickets I received today and I quote "Inmate Wiley was suspected of stealing commissary see #IR#OB-0204" his alleged theft which NONE of the tickets are for is just entered to bias the board and insure I do not receive a fair hearing that is a violation of my inmate rights. I am guaranteed a fair hearing which I cannot and will not receive. I have believe they are using the system to unfairly charge me for this alleged theft that is a violation of my inmate rights. I have received 1 major 1 minor in 7 months now and 24 more I received 4 majors and 2 minors I believe that proves my point of abuse and harassment please respond. Thank You.

SGT MALES  
ATTN

~~ATTN to Knox~~  
~~Unintentional Grievance~~  
Blazer

SGT  
MALES  
ATTN

McHenry County Adult Correctional Facility

INMATE REQUEST

Continued on Back  
SGT MALES

EXHIBIT C

NAME: Kevin Riley Booking I.D. #: 34982

DATE: 2/11/08 CELL #: 2/111

PLACE AND X NEXT TO THE ITEM YOU ARE REQUESTING AND GIVE A BRIEF EXPLANATION BELOW, ONE REQUEST PER SHEET.

REQUEST	_____	MEDICAL ATTENTION
	_____	CHAPLAIN ASSISTANCE
	_____	REQUEST TO SEE PUBLIC DEFENDER
	_____	MENTAL HEALTH COUNSELOR
	<u>X</u>	OTHER REQUEST <u>Grievance</u> <del>Blazer</del> <u>! followup Grievance!</u>

REMARKS: I wrote a Grievance pertaining to a beating I received by the cell extraction team and have no response from the Sgt about this grievance. The Grievance procedure was followed I have medical files to back up what I said SGT MALES was present and therefore involved in the grievance yet he answered the Grievance Verbally refused to give me a formal response and informed me I would be receiving a major violation for

OFFICER RECEIVING REPORT: \_\_\_\_\_ ID # \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

2/11/08 You have not followed the correct channels.  
[Signature]



presence was false I have the medical files in my medical history  
 a back up my statement the Nurse checked me out right after the  
 cell extraction and marked all the lumps on my medical doc. SGT  
 Males is just trying to cover up his involvement or condonement of this  
 action by threatening me with a Major violation I don't care I have  
 been harassed and intimidate enough by this governing system to  
 not be intimidated any more I am denied my basic rights and when I  
 exercise these rights I am given Major after Major as retribution  
 can document this by the amount of paperwork SGT Males and  
 the second shift Sgt Males have given me in the past  
 2 days I have received 5 major violations and 2 minor violations.

When I do bring up valid points in my grievances I am given  
 Major violation as retribution for bring these issues to light.  
 had a valid point when I wrote that during all cell extractions it  
 is Required they be video taped when I was extracted from  
 my cell on 10-21-07 it was not ~~the~~ SGT Males made reference to  
 a video tape I would like a copy of said video tape made  
 available for my attorney as part of a civil case for ~~harassment~~  
 harassment & abuse by Materny County Jail and specific  
 for the abuse continuing & escalating considerably and  
 fear its going to culminate in violence against me or  
 other people. All my rights are being violated by SGT Males.

I just see how SGT Males can answer and reply to a  
 grievance against him this is a conflict of interest of course  
 he will find it invalid and threatened I would like a  
 formal copy and written response to that grievance as  
 well as this one for my attorney and further documentation  
 of this on going problem. I spoke with SGT Males regarding  
 my grievance he refused to afford me a written response this is  
 a failure to!

Thank You.



EXHIBIT D

## McHenry County Adult Correctional Facility

## INMATE REQUEST

Continued on Back

NAME: Kevin Riley Booking I.D. #: 34982DATE: 6-19-08 CELL #: 2/B/145

PLACE AND X NEXT TO THE ITEM YOU ARE REQUESTING AND GIVE A BRIEF EXPLANATION BELOW, ONE REQUEST PER SHEET.

REQUEST	_____	MEDICAL ATTENTION
	_____	CHAPLAIN ASSISTANCE
	_____	REQUEST TO SEE PUBLIC DEFENDER
	_____	MENTAL HEALTH COUNSELOR
	<u>X</u>	OTHER REQUEST

REMARKS: I would like to bring to your attention several points in which McHenry County is violating the rights of pretrial detainees which we request as a group be fixed. We begin with the Unsanitary Conditions, Secondly the Unfair and Improper disciplinary action, and finally the Improper living conditions for those long term Pretrial inmates.  
To begin with the Unsanitary living conditions we have put several request & maintenance request

OFFICER RECEIVING REPORT: Quindale ID # 1791 TIME 02:00ACTION TAKEN: Forward to Admin

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

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to fix the plumbing the fecal matter backs up into all the other cells when one  
cell flushes their toilet. This is highly unsanitary and can spread airborne bacteria  
and disease turning toilets into stagnant water. No attempt has been made to fix  
the problem at all. Staff infection and several other seriously debilitating diseases can  
be passed due to fecal matter and waste byproducts.

Secondly I would like to address the Unfair & Improper disciplinary & Grievance process.  
When we are disciplined we are not afforded a copy of the incident report, the written  
explanation is less than a sentence and refers you to the IR# which we are not  
given a copy of. The ticket is heard by GOS rather than any outside board the  
entire process is set up bias to the inmate. Also the Grievance process is not in the  
least bit effective the grievances are not on separate forms so we are not given  
carbon copies as proof that it was ever written. When they are answered they  
are handled by regular correctional officers who are bias towards the GOS since they  
work directly with the officers your writing up and even when they are valid  
based in provable fact not speculation they are still returned Unfounded.  
When you do continue up the chain it remains Unfounded and doesn't even go  
all the way to the deputy Chief or Sheriff which is our Right and if we  
end it straight there it is thrown out for not following the proper chain of command.

Finally the living conditions for long term pretrial inmates are improper the  
bunks have no arch support, the metal stools don't have any 'lumbar' (back)  
support so you have to remain stooped over causing long term back problems.  
The beds have no springs and the mattress provides no support for long term  
pretrial inmates this is a violation of our rights these living conditions I have been  
in for over 11 months and are starting to feel the side effects of these  
adverse living conditions.

So in conclusion I feel the totality of all the issues the unsanitary conditions,  
the Unfair & Improper disciplinary and Grievance process coupled with the  
improper living conditions for long term pretrial inmates all combine to take  
away our rights under the 5th & 14th Amendments the Due process Clause. I  
have attempted to speak with the GOS about this matter but their reply is its  
the administration who makes those rules no solution can be reached at this  
level. I would like a formal copy and a written response Thank You.

EXHIBIT D)  
Continued

**McHENRY COUNTY SHERIFF'S DEPARTMENT  
BUREAU OF CORRECTIONS**

DATE: 02 July 2008

TO: Inmate Kevin Riley

FROM: Lt. T. Jeeninga Lt. T. Jeeninga/172

SUBJECT: **Grievance dated 19 June 2008**

I have received your grievance concerning your allegations of unsanitary conditions, unfair disciplinary action and improper living conditions.

Maintenance has been advised of the plumbing problem and they are working on correcting the problem. I have been advised that they will be putting in flow restricting devices to correct the back up into adjoining toilets.

McHenry County follows the Illinois County Jail Standards disciplinary procedures. Section 701.160 a) 4) B) states you shall be given notice of the charge, including a statement of the misconduct alleged and rules violated. This is written on the Major ticket you receive with the rule violation prior to your disciplinary hearing.

Per Section 701.160 a) 4) A) the jail administrator may establish a disciplinary board to hear and determine the charges. The person initiating the charge cannot serve on the board that will be determining the charge.

The board reviews the reports, your testimony and will interview any witnesses you may have. The board then impartially determines the disposition of the charges.

All clothing and shoes issued, along with the housing furniture conforms to the standards set forth in the Illinois County Jail Standards.

EXHIBIT E1

## McHenry County Adult Correctional Facility

INMATE REQUESTNAME: Kevin Riley Booking I.D. #: 34082DATE: 6-21-08 CELL #: 21145

PLACE AND X NEXT TO THE ITEM YOU ARE REQUESTING AND GIVE A BRIEF EXPLANATION BELOW, ONE REQUEST PER SHEET.

REQUEST	_____	MEDICAL ATTENTION
	_____	CHAPLAIN ASSISTANCE
	_____	REQUEST TO SEE PUBLIC DEFENDER
	_____	MENTAL HEALTH COUNSELOR
	<u>X</u>	OTHER REQUEST <u>Grievance</u>

REMARKS: I would like to bring to your attention a SCRIAL ISSUE  
and a fundamental error in Marceca v. Chinland & Miller v. Carson  
the court of appeals states as pre-trial detainees we have a  
constitutional right to contact visits which we are being  
denied by McHenry County Jail facility. I would like a formal  
written response. No on duty officer could give me an answer  
I was referred to Administration rules & Guidelines

OFFICER RECEIVING REPORT: Shirley 1791 ID # 1791 TIME 07:00ACTION TAKEN: Forward to AdminWE REQUIRE A COURT ORDER FOR CONTACT VISITS.

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER P. L. Young ID # 1122

REFERRED TO: \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

OFFICER \_\_\_\_\_ ID # \_\_\_\_\_

EXHIBIT F

**By placing a scanner order you authorize the Sheriff to charge your personal funds for the cost of the goods you receive.**

**Order at your own risk.**

#	HYGIENE ITEMS	PRICE
1451	Ivory Soap	\$ 1.20
1490	Black & White Soap	\$ 2.40
1332	DOVE SOAP	\$ 1.70
1329	IRISH SPRING SOAP	\$ 1.10
1121	Colgate toothpaste	\$ 2.90
1389	4 oz. SKIN LOTION	\$ 1.90
5300	Soft/Beautiful Relaxer	\$ 11.00
1368	BLISTEX	\$ 1.50
1500	Loops Flex Toothbrush	\$ 1.65
1126	SPORT STICK	\$ 3.50
1305	Mennon SPEED STICK	\$ 3.00
1124	LADY SPEED STICK	\$ 3.00
1311	Suave Anti-Perspirant	\$ 3.60
3151	Landers Bergamont	\$ 3.30
1404	5" POCKET COMB	\$ 0.15
5556	4 oz. CONDITIONER	\$ 1.10
1310	Pro Hair Food	\$ 2.50
1348	4 oz. Petroleum Jelly	\$ 1.50
1350	Pomade	\$ 3.25
1584	Pony Tail Holder (1)	\$ 0.20
5555	4 oz. Shampoo	\$ 1.10
1411	Suave Shamp/Cond.	\$ 3.30
1202	11oz Dandruff Shampoo	\$ 3.60
1314	Sulpher 8 Conditioner	\$ 5.75
1308	SUAVE SHAMPOO	\$ 1.65
1309	SUAVE CONDITIONER	\$ 1.65
1345	4oz. Baby Oil	\$ 1.35
1346	4oz. Baby Powder	\$ 1.40
1359	4 oz. Cocoa Butter	\$ 1.20

[illegible]

#	MISCELLANEOUS	PRICE
3010	SKETCH PAD	\$ 2.00
3009	9X12 ENVELOPE	\$ 0.40
3014	LEGAL PAD	\$ 1.30
3251	PENCIL TOP ERASER	\$ 0.15
3203	Birthday Card	\$ 1.25
3219	Friendship Card	\$ 1.25
3218	Special Occ. Card *	\$ 1.25
3217	Birthday Card-SpnsH	\$ 1.25
3237	Friendship Card-SpnsH	\$ 1.25
3016	Pocket Dictionary	\$ 2.85
3022	Spanish Dictionary	\$ 2.85
7236	Quran	\$ 12.65
6004	Puzzle Book- no choice	\$ 2.00
3021	STAMPED ENVELOPE	\$ 0.51
3003	PENCIL W/O ERASER	\$ 0.25
3001	10 pack STAMPS	\$ 4.10
3019	FOLDER	\$ 0.50
3307	PLAYING CARDS	\$ 2.00
3303	UNO CARDS	\$ 8.05
9000	Intern'l Phone Card	\$20.00

**damaged during shipping!**

**All sales are final!**

**Order at your own risk.**

**Canteen may substitute**

**items without notice!**

**Prices may change**

**without notice!**

<b>Card Rules</b>	<p>No choice in the card type or style.</p> <p>Requests are not taken. All cards are sold with a stamped envelope.</p> <p><i>Special Occasion Card types can be ordered during their appropriate season:</i></p> <p>Valentines Easter Mothers Day Fathers Day Halloween Thanksgiving Day Christmas Day</p>
<b>ITEM LIMITS</b>	<p>Acetaminophen: 7 pks Cough Drops: 7 pks Antacid: 2 rolls AntiFungal Cr. 1</p> <p>Relaxer Kit: 1 Kit 9x12 env: 5 envelopes</p> <p><b>EYE DROPS: 1</b></p> <p>Shaving Cream: 1 tube Magic Shave: 1 tube Toothbrush: 1</p>



6109	APPLE PIE	\$ 1.05
1630	CERRY PIE	\$ 1.05
1631	CHEESE DANISH	\$ 1.10
6108	HONEY BUN	\$ 0.90
3540	Nacho Cheese Dip	\$ 2.30
6110	MINI DONUTS	\$ 0.95
1628	FUDGE BROWNIE	\$ 0.85
6106	CINNAMON ROLL	\$ 1.00
1685	COMBOS	\$ 0.90
2006	Flour Tortillas	\$ 2.05
1669	Hot & spicy saus 5oz	\$ 2.90
1681	Salami Sausage 5oz	\$ 2.90
9210	Sliced Pepperoni 3oz	\$ 2.60
0124	Slim Jims Twin pak	\$ 1.05
5030	Beef Jerky Bag 1oz.	\$ 1.75
5022	Summer Sausage 2.7oz	\$ 1.75
9136	Beef & Cheese Stick	\$ 1.05
6628	CHEESE SQUEEZE	\$ 0.60
6102	Choc/Ch Cookie 2Pak	\$ 0.60
1671	Chocolate Cookies 5oz	\$ 1.15
6104	OATMEAL COOKIES	\$ 0.60
1600	Dunkin Sticks 6ct	\$ 2.30
1623	Duplex Crème Cookie	\$ 0.80
9202	OAT/HONEY Granola	\$ 0.75
9203	GRANOLA BAR	\$ 0.75
6126	LD Fudge Round Box	\$ 2.30
2790	LD Nutty Bar Box	\$ 2.30
0277	LD Swiss Rolls Box	\$ 2.30
0276	LD ZEBRA CAKE BOX	\$ 2.30
0278	LD Brownie Box	\$ 2.30
1627	Moon Pie Choc 2.75oz	\$ 0.60
6606	OREO COOKIES	\$ 0.75
1660	PopTarts2ct No choice	\$ 0.80
6122	Mrshmlw. Crispy Treat	\$ 0.85
1672	Lemon Cookies 5 oz.	\$ 1.15
9147	P/B SQUEEZE	\$ 0.60
1604	Cheddar Fries	\$ 0.75
5008	Graham Crackers	\$ 0.70
6632	Crunch & Munch 1oz.	\$ 0.80
1606	Hot Fries	\$ 0.70

**No refunds for products  
damaged during shipping.  
All sales final!**

**Order at your own risk.**



Kenn Riley 00000 54982

64982  
8-1457

Wendy C. Riley  
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Rockford, IL 61101



United States Courthouse  
211 South Court Street  
Rockford, Illinois 61101

